

WILLIAM SCOTT HEMPHILL

1 Q Are there pilings involved in that bid?

2 A There are no pilings involved in that bid.

3 Q Are you familiar with the project down in  
4 the Florida, Cape Canaveral area?

5 A Can you be more specific?

6 Q A project involving composite pilings down  
7 in the Cape Canaveral area?

8 A Not off the top of my head.

9 Q Has Hardcore submitted any bid to a  
10 contractor in the Cape Canaveral area since June 25 of  
11 2004?

12 A I can't comment on that.

13 Q Because why?

14 A Because I don't know off the top of my head  
15 without checking any records. And, again, we are not  
16 discussing those as part of the agreement that we have  
17 with our attorney.

18 Q Well, what you indicated is that you  
19 wouldn't identify for us projects by specific name. We  
20 happen to know projects by a specific name. So I'm  
21 asking you if you have bid because there are apparently  
22 some lapses in terms of information that we've gotten  
23 here. So I'm trying to ask the question whether you,  
24 Hardcore, has bid on a project down in the Cape



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1 Canaveral area. This is composite pilings.

2 A I can't answer that because the answer I'm  
3 giving him is not the one he wants.

4 MR. HUGGETT: Okay.

5 THE WITNESS: So, there.

6 BY MR. WERNER:

7 Q What records would you look at to determine  
8 the answer to my question?

9 A I would go back and review any of our  
10 proposals that went out.

11 Q How do you prepare proposals generally? How  
12 does Hardcore prepare proposals?

13 A Carefully.

14 Q What's the process by which Hardcore  
15 prepares the proposals? Are there internal people that  
16 are involved in pricing the project?

17 A Myself and Jeff Pote worked together to  
18 price the project.

19 Q What's Jeff Pote's title or position?

20 A Engineer.

21 Q And what were his duties and  
22 responsibilities with respect to the four quotes that  
23 we just looked at here?

24 A He figures out how much actual composite



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1 material will be in each product.

2 Q Does he do any design work, engineering  
3 work?

4 A He does engineering work.

5 Q And what engineering work is involved in  
6 preparing these quotes?

7 A As I just stated, he determines how much  
8 composite material goes into each product.

9 Q Now, in terms of the communication with the  
10 contractor, you said you're primarily involved in that,  
11 you personally?

12 A Yes.

13 Q All right. Do you use any type of agents or  
14 representatives in communicating or contacting with  
15 agents, with contractors?

16 A We use an agent at times.

17 Q And a single individual, the same person?

18 A Excuse me?

19 Q Is that the same individual that you use?

20 A Yes.

21 Q And for any of these projects, the four that  
22 we just looked at, have you used -- and this is an  
23 outside agent -- somebody that's not actually an  
24 employee of the company?



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1 A Correct.

2 Q Have you used that outside agent for any of  
3 these four projects?

4 A I believe we may have used him on one or  
5 two.

6 Q And who is that?

7 A Coastline Composites.

8 Q Is that a company, Coastline Composites?

9 A Yes.

10 Q And are they, for lack of a better word,  
11 agents or brokers for the contract between or the  
12 proposal between Hardcore and the contractor?

13 A They are a rep.

14 Q A rep.

15 Now, in the general scheme of things, is it  
16 Hardcore that becomes aware of the project and then  
17 contacts Coastline or Coastline becomes aware of the  
18 project and contacts Hardcore or a little of both?

19 A A little of both.

20 Q Now, in preparation for today's deposition,  
21 did you communicate at all with Coastline in terms of  
22 what projects are out there, what they have been doing  
23 on behalf of Hardcore?

24 A No.



## WILLIAM SCOTT HEMPHILL

1 Q Is there a single individual or multiple  
2 individuals at Coastline that you consider the rep or  
3 the agent?

4 A We deal mostly with one individual.

5 Q Is that Steve Shannon?

6 A Yes, it is.

7 Q As far as you're aware, is Shannon currently  
8 pursuing any potential projects on behalf of Hardcore  
9 other than the four that we just talked about here?

10 A I wouldn't know.

11 Q Do you communicate on a regular basis with  
12 Mr. Shannon?

13 A When a project comes up, he communicates to  
14 us.

15 Q Well, since June 25 of 2004, has he  
16 identified any projects to you other than the four that  
17 we have just identified here today that involve  
18 composite pilings?

19 A No.

20 MR. HUGGETT: Is it your testimony that he  
21 identified these four project for you?

22 THE WITNESS: No.

23 MR. HUGGETT: Okay. For the record.

24 BY MR. WERNER:



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1 Q Are you familiar with a company called  
2 Seaward, S-e-a-w-a-r-d?

3 A I know who they are.

4 Q Is there any connection between Seaward and  
5 Hardcore?

6 A Nope.

7 Q Is there any involvement between Seaward and  
8 Hardcore since June 25 of 2004, regarding composite  
9 pilings?

10 A No.

11 Q Have you ever acted as in effect a  
12 subcontractor for Seaward? That is Hardcore.

13 A No, we have not.

14 (Hemphill Deposition Exhibit No. 5 was  
15 marked for identification.)

16 BY MR. WERNER:

17 Q I show you a document I have had marked as  
18 Exhibit 5. And after you have had a chance to review  
19 that, let me know.

20 A Yeah.

21 Q You have had a chance to review that?

22 A Um-hmm.

23 Q It's on Seaward letterhead. It is making a  
24 proposal for a pier in San Diego and it identifies



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1 fender piles. Earlier in the deposition you told me  
2 that fender piles are composite pilings, correct?

3 A Correct.

4 Q And it's identified as Hardcore composite  
5 fender piles, correct?

6 A That's what it says.

7 Q What was the relationship between Hardcore  
8 and Seaward as of August 7, 2003, that caused this  
9 proposal to go out?

10 A I couldn't comment on that.

11 Q And why couldn't you comment on that?

12 A Because this is a Seaward proposal.

13 Q Did you have any dealings with the Seaward  
14 proposal that is dated August 7, 2003?

15 A No.

16 Q Did you quote prior to June 25 of 2004, did  
17 you quote to Seaward for composite pilings, you being  
18 Hardcore?

19 A I believe this is for anything after June  
20 25th.

21 Q I'm trying to find out if it happened  
22 before, what happened before, then I'll know how to ask  
23 the right question after June 25. We've got evidence  
24 of something happening before June 25. I'm trying to



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1 find out what did happen?

2 A We have quoted to Seaward in the past.

3 Q Have you quoted to Seaward on composite  
4 pilings since June 25 of 2004?

5 A No.

6 Q Have you quoted to any other company other  
7 than a contractor, any other companies since June 25,  
8 2004, on composite pilings?

9 A I have provided any bids that we have quoted  
10 since June 25th per your document request.

11 Q Those were the three quotes that you  
12 provided?

13 A Correct.

14 Q And your testimony is that there are no  
15 others that you have quoted?

16 A Correct.

17 Q Has Hardcore provided any oral quotes on  
18 composite pilings since June 25 of 2004?

19 A Can you be a little more definitive?

20 Q Yes, sir.

21 We have been talking about quotes. And for  
22 the most part, we have talked about four specific  
23 quotes that are in writing. These were Exhibit 3 and  
24 Exhibit 4. My question is whether Hardcore has



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1 provided a quote or bid on composite piling projects  
2 orally, something that didn't get reduced to writing?

3 A Not to my knowledge.

4 Q As we sit here today, does Hardcore have any  
5 plans to bid a project on composite pilings? You're in  
6 the process of working on something and the quote is  
7 about to go out in the next days or weeks.

8 A Not to my knowledge.

9 Q Have you targeted any projects which you are  
10 looking at and anticipating that you're going to work  
11 on and provide bids on for composite pilings?

12 A Not to my knowledge.

13 Q Would there be someone within Hardcore who  
14 would have that knowledge other than you?

15 A No, there would not be.

16 Q And as far as Mr. Shannon goes, you haven't  
17 talked with him about what is on his radar screen so  
18 you don't know what he is doing right now?

19 A As I said, he is an independent rep. So I  
20 have no idea what he does on his own.

21 MR. WERNER: We'll take a short break.

22 (A brief recess was taken.)

23 BY MR. WERNER:

24 Q Okay. Mr. Hemphill, I'd like to go back to



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1 the California job, which we were discussing. And I  
2 called it the California transportation bridge job.  
3 You were explaining to me that that job does not  
4 involve composite pilings. Do you recall that little  
5 exchange that we had?

6 A Correct.

7 Q All right. The project does include some  
8 type of square marine structure that's a fender,  
9 perhaps. Is that a better terminology for what the  
10 project does include?

11 A It includes a number of whalers and  
12 supports.

13 Q Do they include some type of tube, square  
14 structure, whatever, of composite material that's then  
15 filled?

16 A What that project consists of is a series of  
17 vertical supports and horizontal whalers.

18 Q All right. Can you describe for me the  
19 vertical supports, not in technical terms, just  
20 generally what they are?

21 A They are 12 inch by 12 inch by 14 foot long  
22 pieces of material.

23 Q And is that generally composite material,  
24 hollow?



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1 A According to the specifications, it can be  
2 fabricated a number of different ways.

3 Q But it is hollow and then intended to be  
4 filled at the project site?

5 A No, it's not. That's not the specification.

6 Q In any event, it's a vertical support, you  
7 call it, out there?

8 A Correct.

9 Q Other than the four projects that we just  
10 talked about here that are represented by the exhibits  
11 and other than the California project, are there any  
12 projects on which Hardcore has bid that involves these  
13 similar vertical supports?

14 A Not that I'm aware of.

15 MR. HUGGETT: You might want to put a time  
16 frame to the question, if it would help. I don't know  
17 if it would help.

18 MR. WERNER: I said since June 25, 2004.

19 MR. HUGGETT: Did he say that?

20 THE WITNESS: I think he said that. I  
21 thought he said that.

22 MR. HUGGETT: He might have. I apologize.

23 BY MR. WERNER:

24 Q Going back to the document, the Seaward



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1 document. In the second half, the option B, there is  
2 some discussion of piles being hollow. Contractor will  
3 have to precast with concrete. Do you see that?

4 A Correct.

5 Q Since June 25 of 2004, has Hardcore bid to  
6 provide any piles that were hollow that we haven't  
7 talked about as part of the four quotes here?

8 A I supplied you with all the quotes  
9 irregardless of whether they were hollow or filled.

10 Q The four quotes that we talked about. Let's  
11 just take them one at a time here.

12 The first one being July 23, 2004. Was  
13 Shannon or Coastline Composites involved in that quote?

14 A I couldn't say specifically.

15 Q The July 27, 2004 quote. Was Shannon or  
16 Coastline Composites involved in that quote?

17 A I couldn't say specifically.

18 Q The August 9, 2004 quote. Was Shannon or  
19 Coastline Composites involved in that one?

20 A I could not say specifically.

21 Q And the September 15, 2004 quote. Was  
22 Shannon or Coastline Composites involved in that one?

23 A I could not say specifically.

24 (Hemphill Deposition Exhibit No. 6 was



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1 marked for identification.)

2 BY MR. WERNER:

3 Q I have just shown you a document that I have  
4 had marked as Deposition Exhibit 6, and ask you to  
5 review that generally. And then I'm going to ask you  
6 some questions about it after you have had a chance to  
7 review it.

8 A Okay.

9 Q Have you ever seen this document before?

10 A No, I have not.

11 Q The document appears to be a fax cover sheet  
12 from Steve Shannon to Bob Schmidt, S-c-h-m-i-d-t. Do  
13 you know who Bob Schmidt, E.I.C., is?

14 A No idea.

15 Q Do you represent this fax as having any  
16 connection to the quote that we previously marked as  
17 Deposition Exhibit No. 4?

18 MR. HUGGETT: I don't understand that  
19 question.

20 THE WITNESS: I don't represent anything. I  
21 just told you this is not my --

22 BY MR. WERNER:

23 Q Okay. Do you recognize --

24 A You just asked me that question and I said



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1 no.

2 Q You don't recognize that?

3 Does Mr. Shannon copy you with whatever  
4 documents he sends on to the contractors?

5 A Not necessarily.

6 Q When he is bidding a project for Hardcore?

7 A Not necessarily.

8 Q Changing topics on you a little bit. I  
9 asked you earlier about a job at Cape Canaveral and  
10 your indication or at least I recall your response to  
11 be you couldn't recall sitting here today?

12 A Correct.

13 Q I'm going to identify for you a series of  
14 general contractors that were involved in this Cape  
15 Canaveral project and ask you if you recognize the name  
16 or if you had any dealings with them.

17 A Harry Pepper & Associates, Inc., in  
18 Jacksonville, Florida, contact, David Pepper?

19 A Doesn't ring a bell.

20 Q PCL Civil Constructors, Inc., in Tampa,  
21 Florida, contact Randy Pegram?

22 A Yeah. It does not ring a bell.

23 Q Grundy Marine Construction in Ponte Vedra  
24 Beach, Florida, contact Mike Grundy?



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1 A Does not ring a bell.

2 Q POC in Cocoa, Florida, contact Robert James,  
3 Jr.?

4 A Again --

5 Q Doesn't ring a bell?

6 A Nope.

7 Q South Gulf, Inc., contact Mike Howell in  
8 Bonifay, Florida?

9 A Nope.

10 Q Triton Marine Construction Corp in  
11 Bremerton, Washington, contact Jeff Tompson?

12 A Nope.

13 Q Continue. A Chuck Viggano in Haines City,  
14 Florida? Do you recall discussing anything with him?

15 A Nope.

16 Q Worth Contracting, Inc., in Jacksonville,  
17 Florida, contact Katherine Worth?

18 A Nope.

19 Q M & J Construction Company of Pinellas  
20 County, Inc., based in Tarpon Springs, Florida, contact  
21 Julie Coffell. Do you have any contact with them?

22 A Nope.

23 Q Coastal Marine Construction, Inc., Larry  
24 Norris, based in Venice, Florida?



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1 A Nope.

2 Q Royal Bridge, Inc., in Tarpon Springs,  
3 Florida, contact Evie Tsalickis?

4 A Nope.

5 Q Steele & Associates, Inc., Alpharetta,  
6 Georgia, contact a Sandy Heggeland?

7 A Nope.

8 Q Having reviewed that list of contractors,  
9 that doesn't refresh your recollection at all of having  
10 contacted any of them in connection with a job down in  
11 the Cape Canaveral, Florida, area?

12 A No, it does not.

13 Q I'll give you one other piece of  
14 information. The project name of Canaveral Lock  
15 Painting & Other Repairs, Canaveral Harbor, Florida.  
16 With that identification of the project, does that  
17 refresh your recollection at all?

18 A No, it does not.

19 Q Just to clarify a point, sir.

20 On the quotes that we have identified here.  
21 I'll start with Exhibit 3. Each of the three quotes  
22 has in the upper right-hand corner a quote prepared by  
23 Jeff Pote. And we see a similar line at a different  
24 spot on Exhibit No. 4.



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## WILLIAM SCOTT HEMPHILL

1 First of all, do you see that on each of the  
2 four quotes that I just identified there?

3 A Yes.

4 Q In response to my questions earlier, I  
5 understood that you were primarily involved in the  
6 quote and Mr. Pote had a lesser role. Why is it that  
7 his name appears on each of those quotes as being the  
8 one that prepared the quote?

9 A There is a very good reason for that.  
10 Because I am computationally inept and Mr. Pote is of the  
11 generation younger and he is quite skilled with the  
12 computer. So he is the one that fills out the sheets  
13 and puts them in. Like types it in literally. So that  
14 it cross-references with our job quote file.

15 Q But in terms of most of the work being done  
16 is done by you?

17 A Correct. That's why I answered the question  
18 the way I did.

19 MR. WERNER: Okay. Thank you, sir. I don't  
20 have any other questions.

21 (Deposition concluded at 11:08 a.m.)  
22  
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## I N D E X

DEPONENT: WILLIAM SCOTT HEMPHILL

PAGE

Examination by Mr. Werner

2

## E X H I B I T S

## HEMPHILL DEPOSITION

NUMBER	DESCRIPTION	MARKED
1	Notice of Deposition	6
2	Hardcore Web Site	9
3	Hardcore Composites Quote	17
4	Hardcore Composites Quote	24
5	Letter dated August 7, 2003, to Tim Linden from Bryan Maphis	33
6	Fax dated 9/15/04 to Bob Schmidt, E.I.C., from Steve Shannon	39



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DEPOSITION CERTIFICATE

SIGNATURE NOT WAIVED

REPLACE THIS PAGE WITH

THE ERRATA SHEET AFTER IT HAS

BEEN COMPLETED AND SIGNED BY THE DEPONENT



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1 State of Delaware :

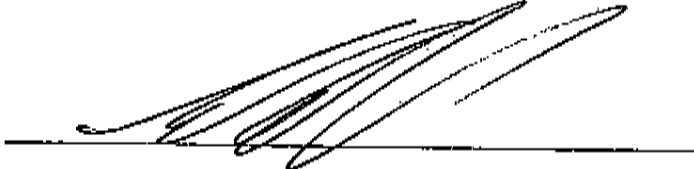
2 County of New Castle :

3  
4 CERTIFICATE OF REPORTER

5 I, Allen S. Blank, Registered Merit  
6 Reporter, do hereby certify that there came before me  
7 on the 12th day of October, 2004, the deponent herein,  
8 WILLIAM SCOTT HEMPHILL, who was duly sworn by me and  
9 thereafter examined by counsel for the respective  
10 parties; that the questions asked of said deponent and  
11 the answers given were taken down by me in Stenotype  
12 notes and thereafter transcribed by use of  
13 computer-aided transcription and computer printer under  
14 my direction.

15 I further certify that the foregoing is a  
16 true and correct transcript of the testimony given at  
17 said examination of said witness.

18 I further certify that I am not counsel,  
19 attorney, or relative of either party, or otherwise  
20 interested in the event of this suit.

21  
22   
23 Allen S. Blank, RMR

24 Certification No. 103-RPR

(Expires January 31, 2005)

25 DATED: October 13, 2004



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Exh 1

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

HARDCORE COMPOSITES OPERATIONS, LLC,

Debtor.

Chapter 11

Case No. 04-11862 (MFW)

**NOTICE OF DEPOSITION**

To: James E. Huggett, Esquire  
Flaster/Greenberg P.C.  
913 N. Market Street, 7th Floor  
Wilmington, DE 19801

PLEASE TAKE NOTICE that pursuant to Rule 7030 of the Federal Rules of Bankruptcy Procedure and Rule 30(b)(6) of the Federal Rules of Civil Procedure, Lancaster Composite, Inc., will take the deposition of a designated representative of Hardcore Composites Operations, LLC on Tuesday, October 12, 2004 at 10:00 a.m., and any and all adjournments thereof, on the matters listed below. Said deposition shall be taken stenographically and shall be held at the law offices of Seitz, Van Ogtrop & Green, P.A., 222 Delaware Avenue, Suite 1500, Wilmington, Delaware.

The matters on which examination is requested are the following (see Lancaster Composite, Inc.'s Interrogatories to Defendant Hardcore Composites Operations, LLC for definitions):

- (1) Each and every Composite Product that Hardcore has made, used, sold (either alone or as a component of a larger assembly), offered in bid, or offered to sell on or after June 25, 2004.



DOCKET NO.: 159  
DATED: 10/5/04

- (2) The amount of Composite Products sold, the gross revenue from such sales, and the amount of net profit from such sales earned by Hardcore since June 25, 2004.
- (3) The amount of Composite Products offered in bid or offered for sale by Hardcore since June 25, 2004.
- (4) Information regarding Composite Products sold, offered in bid or offered for sale on or after June 25, 2004 as part of a system or apparatus, with details regarding the system or apparatus and related sales information.
- (5) Information regarding each person or entity to whom Hardcore has sold, offered in bid or offered to sell, Composite Products on or after June 25, 2004.
- (6) Any communications on or after June 25, 2004 with actual or potential customers of Hardcore concerning the quality of Lancaster Composite products, the comparative quality of any Lancaster Composite products or supplied Composite Products, or the consideration of the use and/or purchase of any product as an alternative or substitute for the Lancaster Composite products.
- (7) Information or instructions to any potential or actual customers on or after June 25, 2004 for any Composite Product as to the use and/or operation of such Composite Product.
- (8) To the extent not specifically identified above, all matters on which discovery has been requested in Lancaster Composite, Inc.'s Interrogatories and Request for Production of Documents addressed to Hardcore and all information contained in Hardcore's responses to the Interrogatories and Request for Production of Documents.

The Designated Representative(s) shall bring all documents requested in Lancaster Composite, Inc.'s Request for Production of Documents addressed to Hardcore, to the extent such documents have not previously been produced, and all documents related to the matters identified above.

SEITZ, VAN OGTROP & GREEN, P.A

Dated: October 5, 2004

/s/ Patricia P. McGonigle  
By: Patricia McGonigle  
George H. Seitz, III, Esq. (No. 667)  
Patricia P. McGonigle, Esq. (No. 3126)  
222 Delaware Avenue, Suite 1500  
P.O. Box 68  
Wilmington, DE 19899  
302-888-0600  
Attorneys for Lancaster Composite, Inc.

OF COUNSEL:

George C. Werner, Esquire  
Court ID No. 28757  
Salvatore Anastasi, Esquire  
Court ID No. 78314  
BARLEY, SNYDER, SENFT & COHEN, LLC  
126 East King Street  
Lancaster, PA 17602-2893  
717-299-5201  
Attorneys for Lancaster Composite, Inc.

cc: Wilcox & Fetzer



IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

HARDCORE COMPOSITES OPERATIONS, LLC,

Debtor.

Chapter 11

Case No. 04-11862 (MFW)

CERTIFICATE OF SERVICE

I, Patricia P. McGonigle, hereby certify that on October 5, 2004, I served a copy of the attached Notice of Deposition on the parties listed below as follows:

James E. Huggett, Esquire  
Flaster Greenberg  
913 Market Street, 7<sup>th</sup> Floor  
Wilmington, DE 19801  
*Counsel to the Debtor*

Via Hand Delivery

Anthony Saccullo, Esquire  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
Wilmington, DE 19801  
*Counsel to the Creditors' Committee*

Via U.S. First Class Mail

Office of the United States Trustee  
Attn: Margaret Harrison, Esquire  
844 King Street, Lockbox 35  
Wilmington, DE 19801

Via U.S. First Class Mail

Elio Batista, Esquire  
Blank Rome, LLP  
Chase Manhattan Centre  
1201 Market Street, Suite 800  
Wilmington, DE 19801  
*Counsel to NAB Construction Corp.*

Via U.S. First Class Mail

Richard D. Kirk, Esquire  
Douglas Candeub, Esquire  
Morris James Hitchens & Williams, LLP  
PNC Bank Center  
222 Delaware Avenue, 10<sup>th</sup> Floor  
Wilmington, DE 19801  
*Counsel to Flow Robotics Systems*

Via U.S. First Class Mail

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Fox Rothschild  
Citizens Bank Center  
919 N. Market Street, Suite 1300  
Wilmington, DE 19801  
*Counsel to Pottstown Metal Welding Co.*

Via U.S. First Class Mail

/s/ Patricia P. McGonigle

  
PATRICIA P. MCGONIGLE (ID #3126)

**ORIGINAL****File a Notice:****04-11862-MFW Hardcore Composites Operations, LLC****U.S. Bankruptcy Court****District of Delaware****Notice of Electronic Filing**

The following transaction was received from McGonigle, Patricia P. entered on 10/5/2004 at 9:51 AM EDT and filed on 10/5/2004

**Case Name:** Hardcore Composites Operations, LLC

**Case Number:** 04-11862-MFW

**Document Number:** 159

**Docket Text:**

Notice of Deposition of a Designated Representative of Hardcore Composites Operations, LLC on Tuesday, October 12, 2004 at 10:00 a.m. in the offices of Seitz, VanOgtrop & Green, P.A. Filed by Lancaster Composite, Inc. (Attachments: # (1) Certificate of Service) (McGonigle, Patricia)

The following document(s) are associated with this transaction:

**Document description:Main Document**

**Original filename:** C:\Documents and Settings\Dclack\My Documents\Bankruptcy Upload\Hardcore\_Lancaster0411862NoticeofDeposition.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=10/5/2004] [FileNumber=3033367-0] [6c636fa5b0ccc63f5eeb383f9e8c28f78e0c8929778dbbaf2c86b8170024c19faa51e604e8f631a12f8d40538025522e7f0db36367dc1fb2347f56c27c3afcaf]]

**Document description:Certificate of Service**

**Original filename:** C:\Documents and Settings\Dclack\My Documents\Bankruptcy Upload\Hardcore\_Lancaster0411862CertificateofService.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=10/5/2004] [FileNumber=3033367-1] [0d1029a5f0f46d084318d78ce3cb1c3c71d2a72d4d99047087d62daf7dcf379e615d6fc6dcaf5e4007b7622fb5d2fdd462fcaae334d16729f53a0f28afc20082]]

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04-11862-MFW Notice will not be electronically mailed to:

Exh 2

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[FAQs](#)  
[CONTACT](#)

## ABOUT HARDCORE

We are the leading manufacturer of large-scale fiber reinforced polymer (FRP) composite structures for infrastructure applications. Founded in 1984, Hardcore has demonstrated its superiority over the years in both manufacturing and market application development. Our products, systems, and components are found in a diverse range of large-scale engineered structures including bridges and walkways, marine fender systems, and specialty composite stay-in-place concrete forms.

We are recognized as the number one producer of composite bridges and specialty composite marine structures. Our growing customer list includes many state departments of transportation, port authorities, highway and marine contractors and specialty concrete repair contractors.





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## BRIDGES



### **We're bridging new solutions with composite technology.**

Hardcore Composites is the leading supplier of composite bridges for vehicular and pedestrian use. Our innovative designs enable us to customize a solution for any bridge challenge. Our proprietary internal core structure enables us to meet or exceed specifications for weight, strength and durability. We are not limited by span length and can routinely fabricate thicknesses from 3" to 48".

### **We consider the entire construction dynamic.**

From deck replacement to new bridge construction, Hardcore Composites offers total project management—from the wearing surface down to the foundation. Our design-build approach takes into account the entire construction dynamic—from design through installation—to maximize the economic benefits of composites.

### **Our pre-engineering saves you money.**

Using classical structure analysis, along with sophisticated finite element modeling (FEM), each composite bridge is value engineered. Design criteria such as AASHTO or state DOT-specified vehicle loads and overall deflection are addressed. Pre-engineering the composites into the project cuts down on costly waste and revisions during fabrication and construction.

### **We make installation a breeze instead of a headache.**

Composite bridges are nearly maintenance-free, resulting in dramatic savings to the public. These factory-engineered structures can be installed year-round. The rapid installation of composite systems greatly reduces the inconvenience and economic impact an out-of-service bridge brings to residents and local businesses.



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## MARINE APPLICATIONS

### Composite Monopiles

Hardcore is the sole producer of large-diameter composite monopiles available in diameters up to 8' OD and continuous lengths in excess of 100'. A highly durable alternative to either timber dolphins or steel monopiles due to their FRP composite construction, these monopiles exhibit the strength and flexibility to withstand the high-impact energies generated by barges and other vessels.

### Fender Piles

Hardcore fender piles offer superior strength and durability when compared to treated timber piles. Unlike timber, Hardcore piles are impervious to degradation and marine borer attack. Available in range of diameters, wall thickness' and lengths, Hardcore manufactures a fender pile that will satisfy your project requirements.

### Fender Panels

Hardcore offers a corrosion-free, lightweight fender panel that provides a longer service life while eliminating the expense of weight chains. Our panels are designed to connect to industry standard, rubber fender elements. Available in a range of sizes and strengths, Hardcore fender panels are the durable solution.

### Dolphin Systems

Hardcore dolphin systems combine composite stay-in-place (SIP) formwork supported on composite piles. Hardcore's lightweight, custom SIP formwork allows for rapid installation and protects steel reinforcing elements in the pile cap. These dolphins can be designed for a variety applications. From mooring and turning dolphins to protecting a pier end, Hardcore can provide a dolphin to meet the requirements of your facility.

### Hardshell Pile Strengthening & Protection Systems

The Hardshell system uses high-strength, prefabricated structural jackets that can be rapidly installed either above or under water. Whether



you need to strengthen a marine borer-infested timber pile or protect a prestressed concrete pile from corrosion, this system will extend the life of your structure.



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## COMPOSITE PILES

### Introduction

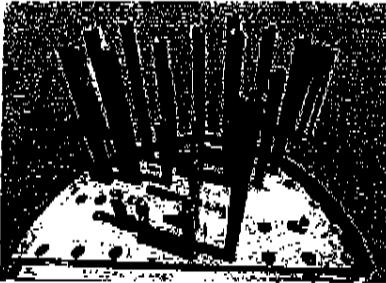
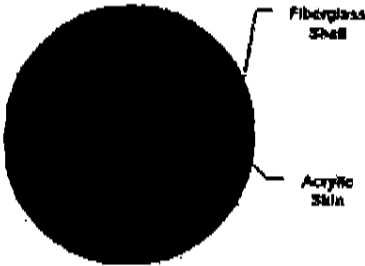
A composite tubular piling is a cylindrical shell fabricated of high-strength fiber-reinforced composite materials. As an option, the outer surface of the shell can be coated with a rubber-toughened, acrylic skin. The acrylic skin provides additional protection against abrasion, ultraviolet (UV) light, and chemicals. The inner surface is textured to create a mechanical lock with a filler material, usually concrete. The piling is molded, shipped and driven as a hollow shell and then is filled with concrete or other appropriate core material. If required, the piling can be filled with concrete at the Hardcore Composites factory and shipped as a complete unit. The resulting structure is a piling system with approximately the same stiffness as timber piling, but it is 4 times stronger and 15 times more energy absorbent.

Industry standard driving equipment, including diesel, vibratory and drop-hammers, can be used to install the composite piling.

The piling can be driven either open ended or with a variety of driving shoes. A standard pipe pile driving helmet or equivalent is used in most applications. The piles are easily cut, drilled and attached using ordinary tools found at most job sites. Hardcore Composites fabricates fiberglass tubular piling using VARTM—Vacuum Assisted Resin Transfer Molding. This production technique results in less than 0.5% voids in the composite. In addition to the standard sizes offered, custom sizes up to 72-inch diameter in shippable lengths are available.

### Availability

Hardcore composite tubular piling is available in standard diameters from 10 to 18 inches in any shippable length. Other sizes are available up to 72 inches in diameter. Standard composite tubular piling is fabricated using fiberglass, custom hybrid glass/carbon fiber composite tubular piling that offers higher stiffness are also



available. The optional acrylic skin is available in most colors, however, the standard color is black.

#### **Mechanical Behavior**

The fiberglass tubular piling is designed to resist tensile, compressive, shear, and torsion stresses. The concrete filler is also used to carry compressive loads and enhances bending performance. Because of the textured inner surface of the piling, mechanical interlock is developed between the concrete and the composite piling. The resulting hybrid structure can carry both bearing and lateral loads while providing energy absorbing capacity. In general, composite tubular piling has the compliance of timber, the strength of steel and the durability of plastic.

#### **Applications and Use of Tubular Composite Piling**

Tubular piling fabricated by Hardcore Composites is highly adaptable and can be specified for several uses. The most common uses are for structures that aid the berthing of marine vessels and for load bearing.



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## PROJECT HIGHLIGHTS

### BRIDGE

<u>Magazine Ditch</u>	DE - Largest composite bridge in North America
<u>Washington School House Lane</u>	MD - Self-supporting bridge installed in one day
<u>Wilson's Bridge</u>	PA - Historic steel truss restoration with composite deck
<u>Bennett's Bridge</u>	NY - Self-supporting bridge wins AASHTO Partnership award
<u>Muddy Run</u>	DE - 32-ft.-span self-supporting bridge
<u>Mill Creek</u>	DE - FRP deck with integral crown, drainage, guardrail attachments, 30-degree skew
<u>Greensbranch Vehicular Bridge</u>	DE - Self supporting vehicular bridge
<u>Greensbranch Pedestrian Bridge</u>	DE - Pedestrian bridge
<u>Bentley's Bridge</u>	NY - Deck replacement. Reduced dead load on old truss bridge by 265 tons
<u>Westbrook Bridge (Project 100)</u>	OH - Self-supporting bridge

### MARINE:

<u>Pier End Dolphin Structures</u>	Integrated composite stay-in-place form and pile system with mounted fender panels
<u>Structure Supports</u>	Sewer Outfall Support Structure. Replacement of timber pile support structure with composite cradle and hybrid

	carbon/E-glass composite pile system.
<u>Composite Monopile</u>	80 ft. x 5 ft. dia. composite tubes used for fendering ferry vessels. Second installation of 80 ft. x 6 ft. dia. monopile
<u>Fender Panels</u>	Composite fender panels mounted on rubber elements at Lewes and Cape May terminals.
<u>New Castle Pier</u>	
<u>Composite Piles</u>	

Exh 3



**Hardcore Composites  
Operations LLC**  
618 Lambsons Lane  
New Castle, Delaware 19720  
302-472-0815 Fax 302-472-0816

Quote to: 1417

Project: [REDACTED]

To: [REDACTED]

Quote prepared by:  
Jeff Pote

QUOTE DATE	F.O.B. POINT	TERMS
7/23/04	New Castle, DE	30% Down, Net 30 upon delivery

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
5, 48.5-ft (45 piles @ 65-ft 40 piles @ 63-ft 1 pile @ 3.5-ft)	16.6-In FRP Pile Piles meet minimum structural requirements as follows: - Bending Stiffness (EI) of $2.75 \times 10^9$ lb-in <sup>2</sup> - Piles to be filled with 6,000 psi concrete - Wall Thickness 0.25-In minimum - Exterior Coat to be Black Epoxy Paint unless customer requests a different color - Straightness to be less than 1.25-In per 10-ft	[REDACTED]	[REDACTED]
85	Heavy Duty Driving Tips for Piles	[REDACTED]	[REDACTED]
3 (Truck Loads)	Shipping	[REDACTED]	[REDACTED]
		<b>SUBTOTAL</b>	[REDACTED]
		<b>TAXES</b>	0.00
		<b>TOTAL</b>	[REDACTED]

- 1) Quote valid for 45 days.
- 2) Delivery 12 weeks ARO
- 3) Shipping Costs to Florida
- 4) All taxes extra as applicable.



Hardcore Composites Authorized Signature

Date



**Hardcore Composites  
Operations LLC**  
616 Lambson Lane  
New Castle, Delaware 19720  
302-472-0816 Fax 302-472-0818

Quote To:

1419

Project:

[REDACTED]

To:

Quote prepared by:  
Jeff Pote

QUOTE DATE	F.O.B. POINT	TERMS
7/27/04	New Castle, DE	30% Down, Net 30 upon delivery

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
2 128-ft (56 piles @ 38-ft)	<b>10-2 FRP Pile</b> Piles meet minimum structural requirements as follows: - Wall Thickness 0.18-in minimum - 10-in Nominal Diameter - Exterior Coat to be Black Epoxy Paint unless customer requests a different color	[REDACTED]	[REDACTED]
140-ft (16 piles @ 40-ft)	<b>12-2 FRP Pile</b> Piles meet minimum structural requirements as follows: - Wall Thickness 0.18-in minimum - 12-in Nominal Diameter - Exterior Coat to be Black Epoxy Paint unless customer requests a different color	[REDACTED]	[REDACTED]
2 128-ft (56 piles @ 38-ft)	<b>10-2 FRP Pile</b> Piles meet minimum structural requirements as follows: - Filled with 5,000 psi concrete - Wall Thickness 0.18-in minimum - 10-in Nominal Diameter - Exterior Coat to be Black Epoxy Paint unless customer requests a different color	[REDACTED]	[REDACTED]
40-ft (16 piles @ 40-ft)	<b>12-2 FRP Pile</b> Piles meet minimum structural requirements as follows: - Filled with 5,000 psi concrete - Wall Thickness 0.18-in minimum - 12-in Nominal Diameter - Exterior Coat to be Black Epoxy Paint unless customer requests a different color	[REDACTED]	[REDACTED]